



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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July 14, 2021

VIA ECF

Honorable Nelson S. Roman
United States District Judge
Southern District of New York
300 Quarropas St.
White Plains, New York 10601-4150

Re: Jason Frey, et al., v. City of New York, et al., 21 CV 5334

Dear Judge Roman:

This Office represents Defendant Superintendent of the State Police Kevin Bruen and the New York City Law Department represents Defendants New York City and Police Commissioner Dermot Shea in the above-referenced action. We write, on behalf of our Office and the Law Department and with consent from Plaintiff's counsel, to respectfully request that the time for all Defendants to respond to Plaintiff's Complaint be extended, *nunc pro tunc* as necessary, to September 14, 2021.¹

The reason for this request is that our Offices have just received requests for representation and copies of the service papers, and more time is required to investigate the facts to determine the appropriate response to the Complaint.

This is the first request for an extension of time to respond to Plaintiff's Complaint. We thank the Court for its attention to this matter.

Respectfully submitted,

¹ The current deadlines appear to be July 14, 2021 for Defendants New York City and Commissioner Shea and July 16, 2021 for Defendant Bruen.

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/s/ Ian Ramage

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cc: Amy Bellantoni, Esq.
(via ECF)

New York City Law Department
(via e-mail)